

**BERTOLDO BAKER CARTER & SMITH**  
7408 West Sahara Avenue  
Las Vegas, Nevada 89117  
702-228-2600 • Fax 702-228-2333

BRETT A. CARTER, ESQ.  
Nevada Bar No. 5904  
LINDSAY K. CULLEN, ESQ.  
Nevada Bar No. 12364  
Bertoldo Baker Carter & Smith  
7408 West Sahara Avenue  
Las Vegas, Nevada 89117  
Phone Number: (702) 228-2600  
Fax Number: (702) 228-2333  
Email: [Carter@nvlegaljustice.com](mailto:Carter@nvlegaljustice.com) and  
[Lindsay@nvlegaljustice.com](mailto:Lindsay@nvlegaljustice.com)  
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

\* \* \*

ALEXANDRA CAMILLE LOPEZ, Individually  
and on behalf of minor child, D.L.,

Plaintiffs,

vs.

UNITED STATES OF AMERICA,

Defendants.

CASE NO: 2:19-cv-00911-JAD-VCF

**JOINT MOTION FOR LEAVE TO FILE  
DOCUMENTS UNDER SEAL**

COME NOW Plaintiffs ALEXANDRA LOPEZ and D.L. (hereinafter Plaintiffs), by and through their attorneys of record, Brett A. Carter, Esq., and Lindsay L. Cullen, Esq., of the law firm of Bertoldo Baker Carter & Smith, and Defendant UNITED STATES OF AMERICA (hereinafter USA), by and through their attorney of record, Holly Vance, Esq., of the United States Attorney's office, and they hereby submit this Joint Motion for Leave to File Documents Under Seal.

Pursuant to LR IA 10-5 and LR IC 6-1 ("parties must refrain from...[using names of minor children]"), Plaintiffs and Defendant USA hereby move for leave to file the Petition for Compromise of Minor's Claim, the resulting Order, and related documents to the compromise of the minor's claim. The parties have reached a settlement of Plaintiffs' claims. As Plaintiff D.L. is a

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minor child, and this minor's settlement does require a minor's compromise pursuant to NRS § 41.200, the sealing of these documents will allow for the minor's full legal name to be included within the Petition and Order, which a Nevada bank does require in order to establish and open a blocked trust account for the minor's proceeds. See **Exhibit 1**, Declaration of Brett A. Carter, Esq. Therefore, the parties file this joint motion and seek leave to file these documents under seal.

DATED this 1<sup>st</sup> day of September, 2021.

DATED this 1<sup>st</sup> day of September, 2021.

BERTOLDO BAKER CARTER & SMITH

/s/ Brett A. Carter, Esq.

BRETT A. CARTER, ESQ.

Nevada Bar No.: 5904

LINDSAY K. CULLEN, ESQ.

Nevada Bar No.: 12364

7408 West Sahara Avenue

Las Vegas, Nevada 89117

Attorneys for Plaintiffs

/s/Holly A. Vance, Esq.

NICHOLAS A. TRUTANICH

United States Attorney

District of Nevada

Nevada Bar No. 13644

HOLLY A. VANCE

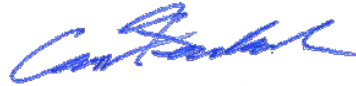
Assistant United States Attorney

400 S. Virginia Street, Suite 900

Reno, Nevada 89501

Attorneys for Defendants

IT IS SO ORDERED.



Cam Ferenbach

United States Magistrate Judge

DATED 9-1-2021

**DECLARATION OF BRETT A. CARTER IN SUPPORT OF JOINT MOTION FOR  
LEAVE TO AMEND TO FILE DOCUMENTS UNDER SEAL**

STATE OF NEVADA )

) ss:

COUNTY OF CLARK )

I, BRETT A. CARTER, ESQ., do hereby swear under penalty of perjury that the following assertions are true to the best of my knowledge:

1. Affiant is an attorney at law, duly licensed before all of the courts of Nevada, and I am an attorney with the law firm of Bertoldo Baker Carter & Smith, attorneys of record for ALEXANDRA LOPEZ and D.L. (hereinafter "Plaintiffs"). I know the following facts to be true of my own knowledge, and, if called to testify, I could competently do so.

2. I make this Declaration in support of the Joint Motion for Leave to File Documents Under Seal pursuant to LR IA 10-5 and LR IC 6-1.

3. The parties have reached a settlement of Plaintiffs' claims. Plaintiff D.L. is a minor child born March 26, 2006. This minor's settlement does require a minor's compromise pursuant to NRS § 41.200. The sealing of these documents will allow for the minor's full legal name to be included within the Petition and Order, which a Nevada bank does require in order to establish and open a blocked trust account for the minor's proceeds.

Pursuant to NRS § 53.045, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1<sup>st</sup> day of September, 2021.

/s/ Brett A. Carter, Esq.  
Brett A. Carter, Esq.